

Social media policy

Updated 2023

Introduction

Social media are web based services that allow you to communicate, network and share information, knowledge, opinions and interests with others. Sites include but are not exclusive to:

- Facebook
- Twitter
- LinkedIn
- Instagram
- YouTube
- Pinterest and
- Online blogs.

Social media is a great way for the North West London Collaboration of Clinical Commissioning Groups (NHS North West London) to interact and communicate with our stakeholders. It is important that employees who use social media within the organisation do so in a way that enhances and builds on our reputation.

Social media is a powerful tool that changes quickly. Employees are encouraged to think of new ways to use it and to put these ideas to the communications team.

When a member of staff identifies that they work for the NHS North West London and/ or discusses their work on a social networking site, they must behave professionally and in a way that respects confidentiality, protects patients, members of the public and work colleagues. As part of a larger, national body - the NHS, a misjudged status update can generate complaints or damage the reputation of both the ICBs and the NHS. There are also security and data protection issues to consider.

This policy explains how employees can use social media safely and effectively.

1. Scope

This policy applies to all staff employed by the NHS North West London (the ICB). It applies to all staff whether employed permanently or on a contract.

The policy sets out staff's responsibilities when using social media and the implications involved. It is not intended to stop members of staff from using social media sites in their own time, but to outline some areas of best practice and illustrate where problems may arise for individual staff members. The policy sets out use of the organisations social media accounts. It also explains the rules about using personal social media accounts at work and describes what staff may say about the company on their personal accounts.

Inappropriate use of social media can damage the reputation of the organisation and the individuals involved. This policy also covers the authorisation, production, maintenance and operation of the ICB and ICS social media accounts and online presence.

2. Use of social media accounts

ICB staff may access social media services and social networking websites at work as part of their job, either through ICB IT systems or via their own personal equipment.

The purpose of this policy is to provide ICB employees with the tools to participate in social media, including ICB hosted social media, and in non-ICB social media in which the employee's affiliation to the ICB is known, identified, or presumed. This policy does not apply to content that is non-healthcare related or is otherwise unrelated to the ICB and its services.

All employees have a responsibility to follow the principles set out in this policy in relation to any social media that they may use. Anyone who is found to have breached them may face disciplinary action in line with disciplinary and codes of conduct policies.

This policy aims to enable staff:

1. To understand their responsibilities when using social media and what should, and should not be written or posted online
2. To highlight the potential risks involved when posting on a social networking site
3. To document the NHS North West London (the ICB) intentions for the use of social media
4. To understand the implications of using social media inappropriately

5. To know where they can go for further advice.

3. Responsibilities

The NHS North West London use social media as part of its communications strategy. The communications team has authority to speak on behalf of the organisation and is responsible for managing the organisations official accounts and websites.

When using social media sites, the communications team will on behalf of the organisation, ensure it:

- Uses social media safely, appropriately and in line with the organisations objectives
- Is respectful towards patients, members of the public and staff members
- Does not reveal confidential or sensitive information about patients, staff or the organisation
- Updates the channels on a regular basis and responds to any requests for assistance or support made via social media
- Removes any content posted by other users that is considered offensive or derogatory
- Delivers both local and national NHS and Public Health campaigns.

4. Authorised users

Only people who have been authorised to use the ICB and ICS social media accounts may do so.

Authorised users of the ICB and ICS social media accounts must be members of the ICB communications team.

5. Creating social media accounts

Only the **ICB communications team** are authorised to create social media accounts in the name of the NHS North West London or the ICS .

Please **do not set up new social accounts or channels for individual services**. It is important that the public are directed to our organisation's official social media accounts - [@HealthierNWL](#) on Twitter, [@staywellnwl](#) on Facebook, [North West London Collaboration of Clinical Commissioning Groups](#) on LinkedIn or one of the eight ICB Twitter accounts, if it relates to a specific ICB.

The NHS North West London communications team operate its social media and online presence in line with a strategy that focuses on the most appropriate social networks, given available resources.

If there is a case to be made for opening a new account, employees should raise this with the central communications team. Unless there is a strong business case for an alternative approach, all new social media accounts or other online presence will be developed and managed by the central communications team. This is to enable standardisation and consistency with the organisations brand, online voice and tone.

NW London ICB employees and teams are encouraged to provide information and content to the communications team for publishing on social media. Use of this content will be reviewed by the team.

6. Staff use of personal social media accounts

Staff who use social media in their personal life should be mindful that inappropriate use could damage their own reputation, that NHS North West London and the NHS.

When a member of staff identifies their association with the NHS North West London, for example, by stating they work for the organisation or posting pictures of themselves at work and/ or discusses their work, they are expected to behave professionally, and in a way that is consistent with the organisation's values and policies.

When using any social media channel staff should follow the principles outlined below.

6.1 Staff must be careful about the personal details they post online.

Think about what you want to use your online profile for and apply the right security and privacy settings. These should also be reviewed regularly as social media sites cannot guarantee confidentiality and do automatically change settings often. Note that unless your account settings are private, your posts can be read by/forwarded to anyone.

6.2 Look out for security threats.

Do use different passwords for different accounts.

6.3 Think before posting.

Do not post anything online that you wouldn't say in public. Your posts are visible to anyone, anywhere and at any time. Be aware of your personal responsibility for what you say on social media and for any comments others may post on your blog or webpage. Whatever is posted on a social media site is in the public

domain immediately, even if it is initially shared with a limited group of followers or friends it could still be copied and shared or published elsewhere. Once information is online, it can be difficult to remove it.

6.4 Read and adhere to the site's terms and conditions.

Check the sites privacy policy before signing up.

6.5 Staff may only use personal social media accounts in their own time.

Unless use is work related you may only use personal social media sites during non-working hours.

6.6 Staff must make it clear that opinions are their own and not those of the NHS North West London or the NHS.

If a member of staff discloses that they work for the NHS North West London or the NHS and can be identified as an employee through association with other people, they should ensure their profile and related content is consistent with how the NHS North West London would expect them to present themselves to colleagues and business contacts.

6.7 Staff must ensure that any information posted is factually correct.

If you discover that you have reported something incorrectly, amend it and make it clear you have done so. Please do not share inaccurate, confidential or sensitive information about NHS services, the ICB or staff on social media.

6.8 Please respect patient and staff confidentiality at all times.

You should only share information about the NHS North West London that are in the public domain, and should not add derogatory comments on these issues. Staff should not air grievances or publish anything that risks bringing the NHS North West London into disrepute.

6.9 Always be respectful and courteous.

Never make negative comments about the NHS North West London, any of our provider trusts, GPs, patients or colleagues on a social networking site. Anything containing sexually explicit, racially offensive, homophobic, harassing, threatening, bullying or other discriminatory remarks is illegal and you could face legal action. You could also face legal action for posting comments aimed at named individuals or organisations that are considered to harm reputation.

6.10 Staff may not identify any patients, or post any personal identifiable data (PID) belonging to patients or their relatives.

This would breach the Data Protection Act and/or your professional Code of Practice, and will have serious consequences including disciplinary.

6.11 **Staff must always adhere to requests made.**

You must always remove information about a colleague, patient or the organisation if asked to do so.

6.12 **Respect copyrights.**

You may not use the NHS North West London or NHS logo anywhere on your social media site or copy photos from the NHS North West London websites, social media accounts or intranet site as these are copyright protected and specific permissions have been given. This does not prevent staff sharing, retweeting or linking to images that have been published on official ICB or NHS sites.

6.13 **When sharing an interesting blog post, article or piece of content**, staff should always review the content thoroughly and should not post a link solely based on the headline.

7. **Misconduct**

Any member of staff found to be using social media sites inappropriately, as outlined in the principles above may be subject to disciplinary action and will be managed in line with the organisations disciplinary policy. The application of this policy will be monitored by the communications team.

8. **Other related policies and procedures**

Staff using social networking sites should always adhere to codes of conduct and policies which are part of their professional and employment requirements.

These include:

- Harassment and Bullying at Work
- Information Security Policy
- FOI (Freedom of Information) Policy
- NHS identity guidelines
- IT Security Incident Reporting
- Disciplinary Policy and Procedure
- Equality and Diversity Policy.

9. **Need any help or advice?**

Please seek advice from the NHS North West London central communications team if you are unsure about any of the points mentioned above.

If staff feel they are being harassed, bullied or victimised as a result of another member of staff's post to an internet site, they can take action. Staff should access



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the NHS North West London bullying and harassment policy which outlines the informal and formal action that can be taken.

Alternatively, they can inform their line manager or an adviser in HR, or report the incident to the police or to the social media site.

If any staff member is in doubt about what they should or should not post on social media sites, particularly about their work or discover online content that may harm the reputation of the NHS North West London then please contact the communications team by email nhsnw1.communications.nwl@nhs.net

If a member of staff is contacted by the media about anything NHS or ICB related that they have written or to request further information or an interview they should contact the communications team. Social networks are not the place to resolve complicated enquiries or any media issues.